

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MICHEAL (SUSIE) HOFFMAN,  
MARGARETT ROUMAIN, GREGORY  
FRANK, VICTOR YUSTMAN, VICTORIA  
FELLOWS, MARIA DEGLAUVE, RON  
OZAKI, BERNHARD J. ORNELLAS,  
ERNEST HEWSON, DONNA LOUCKS,  
ROXANN MERLINI, JO GAWLER, and  
ROBERT KEARNEY,

Plaintiffs,

v.

UNITED AIRLINES, INC., UNITED  
AIRLINES 36-MONTH SUPPLEMENTAL  
BENEFIT PLAN, UNITED AIRLINES  
FRONTLINE VOLUNTARY SEPARATION  
PROGRAM (VSP2), UNITED AIRLINES  
FRONTLINE VOLUNTARY SEPARATION  
LEAVE (VSL) PROGRAM, UNITED  
AIRLINES CONSOLIDATED WELFARE  
BENEFIT PLAN, and UNITED AIRLINES  
RETIREE MEDICAL PROGRAM,

Defendants.

Consolidated  
Civil Action No. 1:21-cv-06395

Honorable Robert M. Dow, Jr.

**DECLARATION OF LINCOLN LOUNSBURY IN SUPPORT OF DEFENDANTS'  
MOTION TO DISMISS PLAINTIFFS' COMPLAINT**

I, Lincoln Lounsbury, pursuant to 28 U.S.C. §1746, declare under penalty of perjury that the following statements are true and correct to the best of my knowledge, information, and belief:

1. I am over eighteen (18) years of age, and I have personal knowledge of, and am fully competent to testify to, the matters set forth herein.

2. I am employed by United Airlines, Inc. (“United”) as Senior Managing Counsel, Benefits. I have held this position since August 28, 2006. In that position, I have responsibilities related to employee benefits at United.

3. A true and correct copy of United’s 2017 Retiree Early Out Eligibility Policy is attached as Exhibit A.

4. A true and correct copy of Frequently Asked Questions (FAQs) further delineating United’s 2017 Retiree Early Out Eligibility Policy is attached as Exhibit B.

5. A true and correct copy of United’s Retiree Early Out Eligibility Policy, as updated October 30, 2020, is attached as Exhibit C.

6. A true and correct copy of the 2020 Voluntary Separation Program (“VSP1”) Plan Document and Summary Plan Description is attached as Exhibit D.

7. A true and correct copy of the 2020 Voluntary Separation Program (VSP1) Waiver of Rights and Claims / Release from Liability is attached as Exhibit E.

8. A true and correct copy of the Frontline Voluntary Separation Program (VSP2) – Program Overview is attached as Exhibit F.

9. A true and correct copy of the United Airlines, Inc. 2020 Frontline Voluntary Separation Program 2 (VSP2) Immediate Separation Plan Document and Summary Plan Description is attached as Exhibit G.

10. A true and correct copy of the United Airlines, Inc. 2020 Frontline Voluntary Separation Program 2 (VSP2) Governing Documents for Option A and Option B is attached as Exhibit H.

11. A true and correct copy of the Frontline Voluntary Separation Program (VSP2) – FAQs is attached as Exhibit I.

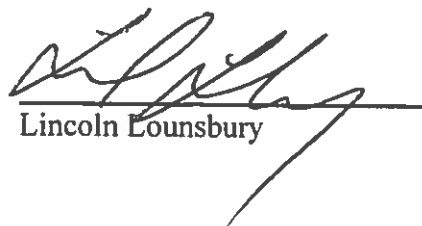
12. A true and correct copy of the United Airlines, Inc. 2020 Frontline Voluntary Separation Program 2 (VSP2) Waiver of Rights and Claims / Release from Liability is attached as Exhibit J.

13. A true and correct copy of the United Airlines, Inc. 2021 Voluntary Separation Leave Program B (Leave-Focused Program) Governing Document is attached as Exhibit K.

14. A true and correct copy of the Frontline Voluntary Separation Leave (VSL) – Program Overview (applicable to flight attendants) is attached as Exhibit L.

15. A true and correct copy of the Frontline Voluntary Separation Leave (VSL) – FAQs (applicable to flight attendants) is attached as Exhibit M.

Executed this 26th day of July 2022, at Chicago, Illinois.



Lincoln Eounsbury